

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

CLAUDIA BALCERO GIRALDO, et al.)	
)	Case No. 7:09-cv-1041-RDP
Plaintiffs,)	
)	
v.)	
)	
Drummond Company, Inc.;)	
Drummond Ltd; Augusto Jimenez;)	
Alfredo Araujo; and James Adkins,)	
)	
Defendants.)	
)	

**PLAINTIFFS' MOTION FOR ISSUANCE OF LETTERS OF ROGATORY
FOR SERVICE OF FOREIGN DEFENDANTS**

Pursuant to Fed. R. Civ. P. 4(f), Plaintiffs respectfully request this Court's assistance in effecting service of process through Letters of Rogatory on the following foreign Defendants based in Colombia: ALFREDO ARAUJO AND AUGUSTO JIMENEZ. In support of their Motion, Plaintiffs state as follows:

1. Colombia is a party to the Inter-American Convention.¹ The Inter-American Convention authorizes services through judicial and/or diplomatic means via Letters of Rogatory.

¹See <http://www.oas.org/juridico/english/sigs/b-36.html>

2. To effect service via Letters of Rogatory, each Letter must be signed and stamped with a seal by this Court as the issuing Judicial Authority.

3. Plaintiffs have attached hereto as Exhibits A and B, respectively, the Letters of Rogatory for each of the referenced foreign Defendants which require a stamp and signature.

Wherefore, Plaintiffs request that their Motion for Issuance of Letters Rogatory be granted and that an Order be entered directing the Clerk of Court to sign and stamp each Letter of Rogatory.

Respectfully submitted on this 17th day of June, 2010 by:

/s/ Terrence Collingsworth

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2010, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of the filing to the following:

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